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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON

FAMILIAS UNIDAS POR LA JUSTICIA, AFL-CIO, a labor organization,

No. 2:24-cv-00637

Plaintiff,

VS.

DECLARATION OF ZACHARIAH RUTLEDGE

UNITED STATES DEPARTMENT OF LABOR, and JULIE SU in her official capacity Acting United States Secretary of Labor,

Defendants.

- I, Zachariah Rutledge, declare under penalty of perjury under the laws of the United States and the State of Washington:
- 1. I am an Assistant Professor of Agricultural and Food Policy in the Department of Agricultural, Food, and Resource Economics at Michigan State University. I make this declaration on behalf of Columbia Legal Services in this case. I am trained as an applied economist and have been conducting economic research related to farm labor for over five years. I have extensive experience analyzing United States farm labor data. I have been qualified as an expert in a previous farm labor case. I am being compensated by Columbia Legal Services for my time. My compensation is not contingent on my opinions or on the outcome of the case. I am

acting in my own individual capacity and not on behalf of Michigan State University. Michigan State University does not endorse, sponsor, or support this work.

- 2. Attached hereto as Exhibit A is a copy of my expert report regarding the average hourly earnings of piece rate harvest workers in the Northwestern United States, which includes the state of Washington.
- 3. Attached hereto as Exhibit B is a copy of my Curriculum Vitae, which includes a list of my publications and a list of my recent expert witness experience.

DATED this 30th day of April, 2024, at Lansing, Michigan.

Zachariah Rutledge

Zuchariah J. Rutledge